

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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UNITED STATES

v.

JOSE E. GONZALEZ,

Defendant

CRIM. NO. 04-10046-RGS

**DEFENDANT JOSE E. GONZALEZ'S MOTION FOR FUNDS  
FOR PREPARATION OF DETENTION HEARING TRANSCRIPT**


Pursuant to Criminal Justice Act, 18 U.S.C., Section 3006A, the defendant Jose E. Gonzalez respectfully requests that the Court issue an order permitting him to expend funds to obtain the transcript of the two (2) day detention hearing conducted before Chief Magistrate Judge Marianne B. Bowler on March 1 and 17, 2004. Counsel is unable to estimate the cost of the transcription in question but notes that the entire detention hearing was conducted in a total of less than four (4) hours: roughly two hours on March 1<sup>st</sup> and less than one and one-half (1 ½) hours on March 17<sup>th</sup>.

In support of this motion, the defendant states that he is charged with distribution of cocaine base and conspiracy to distribute cocaine base in this case. Review of the transcript

of the detention hearing is necessary to prepare for trial and to effectively represent the defendant. It also is necessary to determine whether an appeal of Chief Magistrate Bowler's detention order is appropriate.

Dated: May 10, 2004

Respectfully submitted,  
JOSE E. GONZALEZ,  
By his attorney,

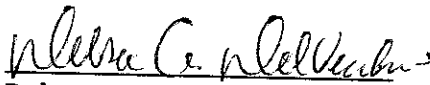
  
Debra A. DelVecchio  
B.B.O. No. 542139  
DEL VECCHIO & HOUSEMAN  
15 Front Street  
Salem, MA 01970  
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AFFIDAVIT OF COUNSEL

Debra A. DelVecchio, being duly sworn, deposes and states that the following is true based upon my information and belief:

1. I was appointed to represent Jose E. Gonzalez, an indigent defendant, in the above-entitled case currently pending before Judge Richard G. Stearns and Chief Magistrate Judge Marianne B. Bowler in the United States District Court.
2. Based upon my review of the documents provided by the prosecution during discovery, I need to review the testimony of the government's detention witness in order to adequately prepare for trial as well as assess whether to file an appeal of Chief Magistrate Judge Bowler's detention order.
3. All of the information contained in my foregoing motion is true to the best of my knowledge and belief, and is incorporated into this affidavit as if fully recited here.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 11th  
DAY OF MAY, 2004.

  
Debra A. DelVecchio  
B.B.O. No. 542139